

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 23-160 (NEB/JFD)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	GOVERNMENT'S TRIAL
)	BRIEF
CORTEZ BLAKEMORE (14),)	
)	
ROBERT LESURE (33),)	
)	
Defendants.)	

The United States of America by and through its attorneys, Joseph H. Thompson, Acting United States Attorney for the District of Minnesota, and Assistant United States Attorneys Thomas Calhoun-Lopez and Albania Concepcion, respectfully submits its trial brief in the above-captioned case.

I. TRIAL COUNSEL

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II. INDICTMENT

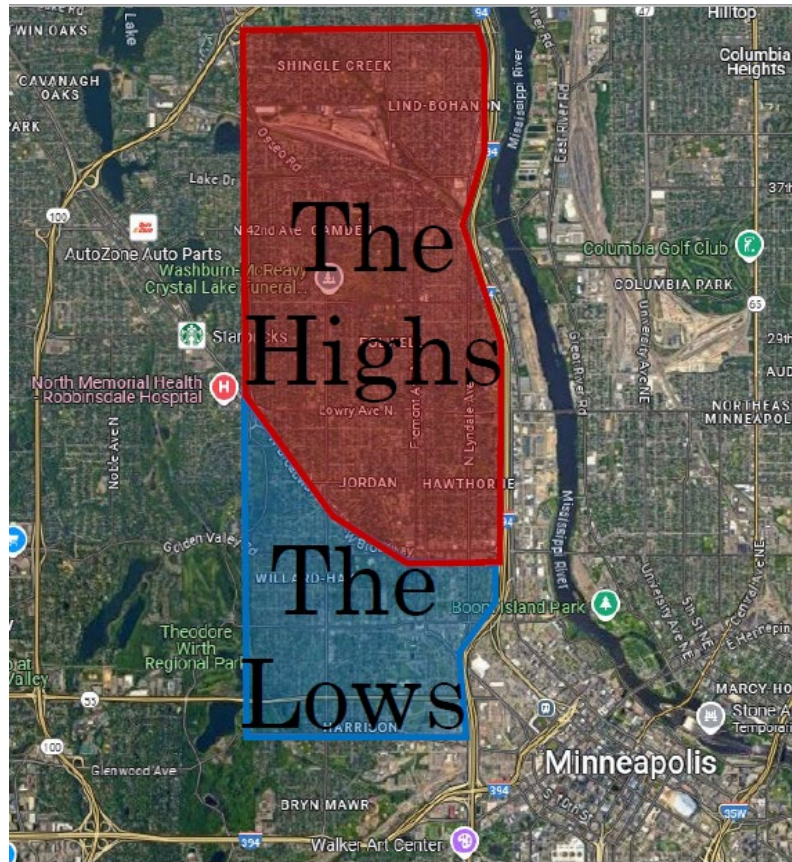
The trial indictment (ECF No. 1708, Third Superseding Indictment) charges the defendants each with two counts: RICO Conspiracy (Count 1); and Conspiracy to Distribute Controlled Substances (Count 3).

III. SUMMARY OF THE EVIDENCE AT TRIAL

The United States anticipates evidence at trial will prove the following:

a. The Enterprise: The Highs Gang

The Highs Gang is a street gang that has existed in Minneapolis since the early 2000s. The Highs are primarily active in the area north of West Broadway Avenue in Minneapolis. By contrast, the High's main rival—the Lows—are active in and control territory south of West Broadway Avenue. Members of the Highs have committed crimes including murder, narcotics trafficking, weapons violations, burglaries, robberies, assault, and fraud.



The government anticipates one or more witnesses with prior or current affiliations/memberships within the Highs (referenced herein as “Cooperating Defendant”) will testify, in effect:

- Members of the Highs are loosely organized into a series of sub-units, or “cliques,” that operate somewhat independently of one another. The most prominent sects of the Highs are Young N’ Thuggin’ (“YNT”), Freeshotz/Bodygang, SayLess, Taliban, Emerson Murder Boys (“EMB”), Black Mob, and others. Some High members belong to more than one clique.
- The Highs congregate at specific businesses within their territory, including Winner Gas Station, Merwin Liquors, Walgreens, AutoZone, and Boost Mobile.
- The Highs do not have a formal rank structure. The Highs have members who are more respected than others and are considered

leaders. These members control the drug trade in Highs territory and often take the lead in obtaining and distributing firearms.

- There is no formal initiation process to join the Highs. Instead, prospective members prove their loyalty to the gang by committing acts of violence for the benefit of the gang or offering another benefit to the gang, such as introducing a source for firearms or narcotics. Highs members can be kicked out of the gang, or physically assaulted, or both, for failing to “put in work.”

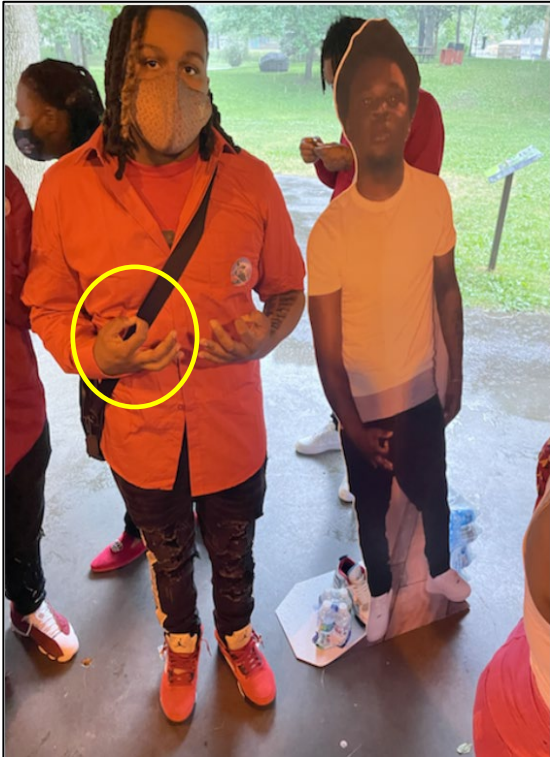
Highs members demonstrate their affiliation with the gang in multiple ways, including, but not limited to: using common phrases or monikers on social media to publicly identify themselves with their gang, such as posting “Broadway”—a reference to the intersection at West Broadway Avenue and Lyndale Avenue North; paying tribute to deceased or incarcerated members publicly on social media; wearing clothing with gang-related phrases and tributes to deceased members; and utilizing common hand signs.



Highs member Montez Brown and defendant Blakemore making the “YNT” clique hand-sign.



Defendant Lesure making the “YNT” hand-sign



Defendant Lesure making the “Boosie” hand-sign



Defendant Blakemore wearing a tshirt paying tribute to fallen Highs member, Jamarius Shief or “Boosie”

Highs members also post on social media to antagonize and disrespect the Lows, such as by making the Low’s L-shaped hand sign with their thumb and index finger and pointing their index finger towards the ground. This is referred to as “dropping the L.”



Defendant Blakemore with deceased YNT Highs member Prince Martin (yellow circle), EMB Highs member Calvin Wright (green circle), and others.



Defendant Blakemore dropping the "L"
with Highs member Ronnell Lockhart



Defendant Lesure dropping the "L"

Members of the Highs also created rap videos to promote their gang and antagonize the Lows. For example, Highs member Gregory Brown created a video on YouTube on January 17, 2021 called "Not from the Lows," in which members of the Highs can be seen wearing gang clothing, making gang signs, rapping about different Highs cliques and territory, and disrespecting the Lows. Similarly, defendant Lesure appears in a video posted on YouTube on July 27, 2023 called "BoowayShiesty x BabyChops – D.O.A." In the video, Lesure and other Highs members make gang signs, reference fallen Highs members Prince Martin (a.k.a "Boo") and Jaylen Salter (a.k.a "Munna"), and rap about "sliding" against the "oops."

Highs members work together and commit crimes together, including murder, robbery, and narcotics trafficking that fuels the enterprise's cash-flow. Members of every clique participate in drug trafficking, and firearms are commonly used to protect the Highs, their territory, and importantly their drug trade. Highs members also use firearms and money to promote the status of the gang and to instill fear in their rivals. They are also expected to come to the aid of one another, especially in retaliation when targeted by the Lows. Testimony at trial will show this is known as "sliding."

1. *Alleged Overt Acts: Murder and Carjacking*

The purposes of the Highs includes committing crimes of violence to promote and enhance the reputation of the enterprise and to keep rival gang members in fear; and to enrich gang leaders, members, and associates through fraud, narcotics trafficking, firearms, and the commission of robberies. Highs members gain status in the enterprise by committing criminal activities beneficial to the gang. For example, Highs members are expected to locate and kill rival gang members, particularly after an act of violence has occurred against a Highs member. By committing such violence, Highs members gain respect in the gang, which can include receiving protection, financial opportunities, and access to narcotics and firearms.

i. Shooting of Arequise Morgan and Murder of Darryl Wells

On August 7, 2021, Prince Martin, a prominent Highs member, was shot and killed at the Winner Gas Station. Martin was a well-respected member of the YNT clique and the Highs in general. On August 8, 2021, a memorial was held at Winner Gas that attracted large crowds of Highs members. Members of the Highs encouraged each other to retaliate against Lows members for the murder. Surveillance footage from Winner Gas captured Highs members in attendance at the Winner Gas both the day of the shooting, like defendant Lesure and Avante Nix, and the day of the memorial..

At around 5:42 p.m. that day, Dantrell Johnson and Gregory Hamilton drove to Wally's Foods and shot Arequise Morgan, a Lows associate. The van then drove to a nearby Salvation Army parking lot, where Dantrell Johnson and Hamilton met up with William Johnson and walked back to Winner Gas. Morgan was shot in the back and survived his gunshot wound.

Approximately two hours after the shooting of Morgan, Dantrell Johnson, Hamilton, Keon Pruitt, William Johnson, and two juveniles travelled to the Skyline Market, a known Lows hangout, where they shot and killed Darryl Wells. This was another shooting intended to retaliate against the killing of Prince Martin; the defendants mistakenly assumed that Wells was a Lows member, when in fact he had no gang affiliations whatsoever.

ii. Leneal Frazier Assaulted and Carjacked a Lows Member at Gunpoint.

On August 15, 2023, Sayless Highs member Leneal Frazier kidnapped and violently assaulted a Lows member, recorded the incident, and then publicly posted his actions on his Facebook account, “Babychop Lyjaland.” In the video he posted after the assault, Frazier is seen sitting behind J.E. and holding a gun to J.E.’s head. Frazier then demands that J.E. insult deceased Lows gang members as he mocks J.E. for being naked from the waist down. Frazier also mocks J.E. for how easy it was to corner him and continues to berate J.E. by slapping him, forcing him to remove his shirt, and demanding his car and money. Throughout the video, Frazier points the firearm at J.E., maintaining control over the situation until the video abruptly ends after six minutes.

Later that day, law enforcement executed a search warrant at Frazier’s residence and found the scarf he wore in the video, a Glock handgun matching the one used in the assault, and J.E.’s identification and car keys. J.E.’s stolen car was also found in Frazier’s garage, with blood on the driver’s seat.



Frazier in the backseat behind J.E.



Frazier brandishing a firearm at J.E.'s bloodied head

2. *Other Overt Acts: Possession and Sharing of Firearms*

As demonstrated by even these two acts of murder and violent carjacking, Highs members frequently use and share firearms as part of their membership in the criminal enterprise. A cooperating defendant will testify about one of the benefits of membership in the Highs: access to and the trading and sharing of firearms among members and associates. He will further testify that proceeds from narcotics transactions are used to purchase firearms and narcotics, which are distributed among Highs members or used to further distribute narcotics.

i. Defendant Lesure Possessed Marijuana at Winner Gas and a Highs Member Possessed Firearms.

On August 11, 2021, police attempted to stop defendant Lesure in a gold Cadillac near Merwin Liquors. Police believed Lesure and the front seat

passenger, Highs member Antone Love, were in possession of firearms. Lesure did not stop for police, but circled the area until Love fled from the vehicle on foot. Police chased Love and observed him discard a bag in the yard of 2411 Aldrich Avenue N. The bag contained a Glock and Springfield firearm and a fully loaded drum magazine. Lesure eventually stopped fleeing in the Cadillac and was taken into custody. A search of the vehicle recovered 1772.3 grams of marijuana and \$311 in cash.



Glock Model 34 Gen 5 9mm, S/N: BPPV706



Marijuana and digital scale located inside Cadillac

ii. Defendant Lesure Possessed a Firearm and Marijuana at Winner Gas.

On October 13, 2021, police observed defendant Lesure in the Winner Gas station parking lot. Law enforcement knew that Lesure had an active warrant out for his arrest for fleeing police in a motor vehicle two days earlier. When

police approached Lesure, he was standing next to a black Ford Edge they had previously seen him driving. After taking Lesure into custody for the warrant, police observed a bag of marijuana near the center console. A search of the vehicle recovered not only the marijuana but also empty magazines, including a drum magazine from under the driver's seat. Police obtained a warrant for the vehicle, and a further search recovered a loaded firearm, a baggie of ammunition, and marijuana hidden behind a panel.



Firearm found inside panel of Ford Edge



Marijuana on center console of Ford Edge

iii. Defendant Lesure Possessed a Firearm and Marijuana near 42nd Avenue and Lyndale Avenue North.

On January 31, 2023, members of the Hennepin County Violent Offender Task Force (VOTF) observed a vehicle with suspected illegal window tints traveling at a high rate of speed near 42nd Avenue and Lyndale Avenue North.

Police attempted to stop the vehicle, but the driver, defendant Lesure, fled until he hit a dead end. When police activated their emergency lights, Lesure and the front seat passenger exited the vehicle and fled on foot. Lesure ran into a nearby backyard, stopping near a wooded fence. After Lesure was taken into custody, a search of the area near the wooded fence recovered a Glock 22 Gen 4 .40 caliber firearm on the top layer of snow.

iv. Defendant Lesure Possessed a Pistol in Hopkins, MN.

On November 15, 2203, defendant Lesure was arrested on a federal warrant in relation to his involvement in this case. Lesure was staying at his girlfriend's residence, which was also subject to a search warrant. During an initial safety sweep, members of the Hennepin County Emergency Services Unit (ESU) observed a back AR pistol standing in the corner of the master bedroom. The pistol had an inserted magazine that was loaded with 35 rounds. A full search of the apartment also located a money counter, \$1,637 in cash, several firearm magazines, and ammunition.



3. *Other Overt Acts: Narcotics Trafficking*

Another purpose of the Highs enterprise is to enrich the leaders, members, and associates through, among other things, illegal trafficking and distribution of controlled substances. A cooperating defendant will testify that Highs members often sold marijuana, fentanyl pills, and other narcotics outside of Merwin Liquors, Winner Gas station, and other high-traffic areas in Highs territory. Highs members gain respect and stature in the gang by making more money from narcotics sales.

i. Defendant Lesure Possessed Marijuana at Merwins.

On August 24, 2021, police responded to Merwins Liquor to arrest Highs member Gregory Hamilton for his involvement in the murder of Darryl Wells. Defendant Lesure was in the parking lot when police arrived. Lesure backed away and an officer saw him throw a backpack underneath a nearby vehicle. Police immediately retrieved the vehicle from under the car and found approximately 137 grams of marijuana inside. A search of Lesure also recovered \$770 from his person. Lesure was arrested and admitted that the money on his person was “drug money,” that he threw the backpack with the marijuana inside, and that he had been selling it earlier.

ii. Defendant Blakemore Possessed Marijuana.

On September 18, 2021, police executed a traffic stop on a white Chevy Impala with no license plate or visible temporary registration. Defendant

Blakemore was driving. Police detected the odor of marijuana emanating from the vehicle and observed a small bag of marijuana in Blakemore's lap. A search of the vehicle recovered a bag containing 214.84 grams of marijuana inside the glove compartment. Blakemore immediately admitted the bag was his.

iii. Defendant Lesure Possessed Marijuana at Winner with a Highs Member.

On November 9, 2021, Minneapolis Police Officers conducting focused enforcement near the area of Winner Gas recognized defendant Lesure and a known Highs member, Tymeer Baker, in the parking lot. Police knew that defendant Lesure was trespassed from Winner Gas and that Baker had an active warrant for his arrest. As police entered the parking lot, Lesure and Baker fled to the nearby Walgreens parking lot. Lesure threw something underneath a silver vehicle before eventually stopping and being taken into custody. Under the vehicle, police recovered a bag containing 18.950 grams of marijuana.

A cooperating defendant will further testify that Highs members shifted from marijuana to fentanyl, and that the gang had at least one source of fentanyl in Arizona. In the course of their investigation, law enforcement officers found significant evidence in the form of flight records, digital communications, and

intercepted drug parcels, showing the pattern of narcotics distribution from the Highs' sources in Arizona to Minneapolis.

iv. Defendant Lesure Possessed Marijuana at Merwins.

On July 8, 2022, police entered the Merwins Liquor parking lot and observed a large group of people run from a dice game, leaving multiple vehicles running in the parking lot. Police looked inside some of those vehicles, including a Chrysler 300 that was associated with defendant Lesure. Police looked inside the vehicle and saw marijuana buds on the floor. Defendant Lesure approached police with Highs members Avante Nix and Antone Love and ultimately told police to search the vehicle rather than tow it. A search of the vehicle recovered two large bags of marijuana, a credit card with Lesure's name, and a large sum of cash inside a black bag. Police also recovered another bag of marijuana and a digital scale from the center console. The three bags of marijuana weighed 57.5 grams without packaging.

v. Flight Records

Law enforcement officers obtained records of flights for multiple Highs members engaged in narcotics trafficking, including for example, co-Defendants Ronnell Lockhart, Gregory Brown, Montez Brown, Robert Lesure, Avante Nix, Deandre Poe, and Calvin Wright. As detailed below, flight records showed how these gang members would regularly travel to and from Minneapolis and Phoenix

to purchase fentanyl pills and other narcotics, to bring back for sale on behalf of the enterprise in Minneapolis:

- From July 27, 2020 through June 11, 2023, Ronnell Lockhart took at least seven round trip flights from Minneapolis to Phoenix.
- From May 16, 2021 through March 18, 2022, Montez Brown took at least ten round trip flights from Minneapolis to Phoenix.
- From July 1, 2021 through June 21, 2022, Gregory Brown took at least eleven round trip flights from Minneapolis to Phoenix.
- On November 28, 2021 to December 1, 2021, Gregory Brown, Defendant Lesure, Avante Nix, and Calvin Wright flew round trip between Minneapolis and Phoenix.
- From November 28, 2021 to November 16, 2022, Nix took at least ten round trip flights from Minneapolis to Phoenix.
- From November 6, 2022 through May 24, 2023, Deandre Poe took at least seven round trip flights from Minneapolis to Phoenix.

A cooperating defendant will testify that G. Brown is an EMB member of the Highs while Montez Brown is a YNT member of the Highs. Both were large scale narcotics distributors for the Highs. He will explain that both G. Brown and M. Brown sold fentanyl pills to other Highs members and distributed pills in the quantities of thousands.

vi. Intercepted Parcel of Fentanyl for Calvin Wright

On April 26, 2022 law enforcement officers traced the delivery of a package of suspected narcotics to C. Wright's residence. They conducted physical surveillance on his home, and observed a U.S. Postal Service employee walk towards C. Wright's townhome and confirm that the delivery was made.

Approximately one hour later, law enforcement observed a vehicle leaving C. Wright's garage.

Law enforcement officers conducted a traffic stop on the vehicle and identified C. Wright was the driver. They searched the vehicle and located 2.1 kilograms of fentanyl pills in several heat-sealed bags in the trunk. Thereafter, they obtained and executed a search warrant for C. Wright's residence and recovered a total of approximately \$25,000 in U.S. currency from C. Wright's master bedroom and bathroom. They also found approximately \$1,100 on C. Wright's person and another \$1,500 from the driver's side door of his vehicle. Giles was present at C. Wright's residence during the execution of the search warrant and possessed approximately \$6,000.

vii. Defendant Blakemore Possessed Fentanyl

On June 11, 2022, police initiated a traffic stop on a white Charger with illegal window tint in the area near West Broadway and Lyndale Avenue North in Minneapolis. The driver, defendant Blakemore, did not immediately stop so police pulled in front of him to cut the vehicle off. Police could see Blakemore through the lowered front passenger window and yelled for him to put his hands up. Police could see Blakemore reaching his right hand near his waistband as if to conceal something. Once Blakemore stopped the car, and without prompting, he told police he "had guns on him."

Police pat searched Blakemore for weapons on the outside of his clothing, feeling around his midsection area where he was previously reaching. They immediately felt a hard object near Blakemore's groin area consistent with a bag of pills. Blakemore denied having pills down his pants, but a further search recovered a large plastic bag containing 908 fentanyl pills.



Baggie containing 908 fentanyl pills pulled from defendant Blakemore's waistband.

Later that same month, following weeks of investigation, police obtained a search warrant for Blakemore's apartment. During surveillance before the search, police saw Blakemore leaving the underground parking garage in his known white Dodge Charger. The Charger had illegal window tints and police knew that Blakemore had a revoked driver's license. Police executed a traffic stop as Blakemore pulled into a parking lot near 923 West Lake Street. A search of Blakemore's person recovered approximately 109 fentanyl pills.



Baggie containing 109 fentanyl pills pulled from defendant Blakemore's waistband.

viii. Defendant Lesure Possessed Marijuana and Fentanyl at Merwins.

On August 17, 2022, Minneapolis Police dispatched to Merwin Liquors in response to 911 calls that a large group of males were outside selling fentanyl and the business wanted them cleared. When police arrived, they saw three males run inside the store, recognizing one of them as defendant Lesure. Surveillance video captures Lesure running into the store, ducking down, and discarded something on a liquor shelf. Police heard a loud “clink,” and suspected Lesure had discarded a firearm. Police walked over to the shelf where Lesure ducked down and observed a black fanny style bag commonly used to conceal firearms. Inside the bag, was marijuana and a commercial marijuana package that contained 97 fentanyl pills.

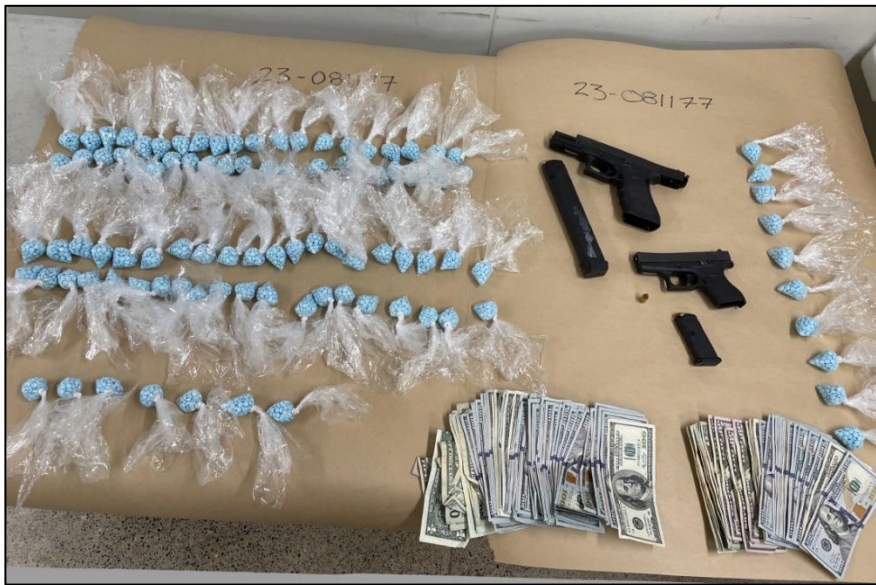


ix. M. Brown's Possession of Firearms, U.S. Currency, and Fentanyl Pills for Distribution on April 4, 2023

On April 4, 2023, MPD's gun unit conducted surveillance on M. Brown's residence to attempt to execute an outstanding arrest warrant. They observed M. Brown leave his residence and get into a tan Tahoe and drive away. They also observed a black Mercedes parked directly in front of M. Brown's residence. MPD officers conducted a traffic stop of the Tahoe at a nearby Holiday Gas. M. Brown exited the vehicle, and officers recovered a large quantity of fentanyl pills hidden under the cupholder in the center console of the vehicle. The pills were packaged in ten baggies, each of which contained 100 pills. Officers also recovered \$2,738 in cash from M. Brown's person.

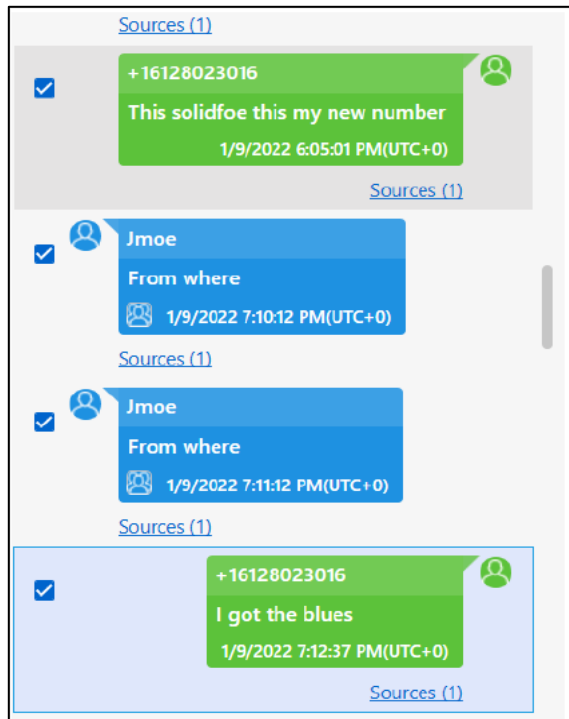
Officers also obtained a search warrant for M. Brown's residence and searched the Mercedes. Inside the living room, MPD found a small duffel bag that contained M. Brown's identification cards and nearly \$6,000 in U.S.

currency. In the Mercedes, officers recovered a Glock firearm with a full automatic switch attached to it and an extended magazine; a paper grocery bag containing thousands of fentanyl pills, packaged in the same way as the ones found in the Tahoe; a second Glock firearm.



b. *Digital Evidence*

Through this investigation, law enforcement has recovered several digital communications between Highs members discussing travel and other logistics to conduct their narcotics trafficking for the enterprise. For example, the United States will present data from the Defendants' cellular device extractions showing several indicia of narcotics trafficking – including the negotiation of pricing, transaction locations, and product availability. Text and social media messages will similarly confirm that each of the Defendants used digital devices and platforms to coordinate sales of narcotics, negotiate pricing of narcotics, and communicate with sources/distributors of narcotics.



Defendant Blakemore Discusses Drug Trafficking



Defendant Lesure Discusses Drug Trafficking

Law enforcement officers also recovered photographs of narcotics and bulk cash taken by Highs members, including these Defendants, on their cell phones.



Defendants Lesure and Blakemore with Bulk U.S. Currency

/s/ Albania Concepcion

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